

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (BRL)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

BEACON ASSOCIATES LLC I, BEACON
ASSOCIATES LLC II, BEACON ASSOCIATES
LLC, BEACON ASSOCIATES MANAGEMENT
CORPORATION, ANDOVER ASSOCIATES, L.P.,
ANDOVER ASSOCIATES LLC I, ANDOVER
ASSOCIATES (QP) LLC, ANDOVER
ASSOCIATES LLC II, ANDOVER ASSOCIATES
MANAGEMENT CORPORATION, JOEL
DANZIGER, HARRIS MARKHOFF, J.P.
JEANNERET ASSOCIATES, INC., JOHN
JEANNERET, PAUL PERRY, IVY ASSET
MANAGEMENT LLC, LAWRENCE SIMON,
HOWARD WOHL, IVY BIRCHWOOD
ASSOCIATES, L.P., IVY ENHANCED INCOME
FUND, IVY OAKWOOD ASSOCIATES, L.P., IVY
REGENCY FUND, L.P., IVY ROSEWOOD
ASSOCIATES, L.P., and IVY ROSEWOOD
OFFSHORE FUND, LTD.,

Defendants.

Adv. Pro. No. 10-05356 (BRL)

STIPULATION AND ORDER

IT IS HEREBY STIPULATED AND AGREED, by the undersigned counsel herein, that (i) the time by which all Defendants may move, answer or otherwise respond to the Complaint is extended up to and including **April 11, 2011** and (ii) the pre-trial conference, which was originally scheduled for April 27, 2011 at 10:00 a.m., will be held on **May 25, 2011 at 10:00 a.m.**

The parties reserve all rights and defenses they may have, and entry into this stipulation shall not impair or otherwise affect any such rights and defenses, including challenges to personal jurisdiction, or the jurisdiction of this Court or any other Court.

This stipulation may be executed in any number of counterparts and all such counterparts shall together constitute one and the same agreement.

Dated: New York, New York
March 11, 2011

By: /s/ Howard L. Simon
Howard L. Simon (hsimon@windelsmarx.com)
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*Special Counsel to Irving H. Picard, Trustee for
the SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC*

Dated: New York, New York
March 2, 2011

By: /s/ Lewis J. Liman
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Attorneys for Ivy Asset Management LLC, Lawrence Simon, Howard Wohl, Ivy Birchwood Associates, L.P., Ivy Enhanced Income Fund, Ivy Regency Fund, L.P., Ivy Rosewood Associates, L.P., and Ivy Rosewood Offshore Fund, Ltd.

Dated: New York, New York
March 9, 2011

By: /s/ Tab K. Rosenfeld
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Attorneys for Beacon Associates Management Corporation, Andover Associates Management Corporation, Joel Danziger, and Harris Markhoff

Dated: New York, New York
March 1, 2011

By: /s/ Arthur Jakoby
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Attorneys for Beacon Associates LLC I, Beacon Associates LLC II, Beacon Associates LLC, Andover Associates, L.P., Andover Associates LLC I, Andover Associates (QP) LLC, and Andover Associates LLC II

Dated: New York, New York
March 1, 2011

By: /s/ Brian Whiteley
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-and-

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*Attorneys for J.P. Jeanneret Associates, Inc., John
Jeanneret, and Paul Perry*

SO ORDERED:

DATED: New York, New York
March 14, 2011

/s/Burton R. Lifland
Honorable Burton R. Lifland
United States Bankruptcy Judge